

EXHIBIT L

Micky Gilbert, PE - 4/16/2019

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<p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA</p> <p>-----</p> <p>RYSTA LEONA SUSMAN, both) Case No. 8:18-cv-00127 individually and as Legal) Guardian of SHANE ALLEN) LOVELAND, et al.,) Plaintiffs,) vs.) THE GOODYEAR TIRE &) RUBBER COMPANY,) Defendant.)</p> <p>-----</p> <p>VIDEO DEPOSITION OF MICKY GILBERT, P.E. April 16, 2019</p> <p>-----</p> <p>APPEARANCES:</p> <p style="padding-left: 40px;">KASTER, LYNCH, FARRAR & BALL, LLP By Kyle W. Farrar, Esq. 1010 Lamar Street Suite 1600 Houston, Texas 77002 Appearing on behalf of Plaintiffs. GREENSFELDER, HEMKER & GALE, P.C. By Edward S. Bott, Jr., Esq. 10 South Broadway Suite 2000 St. Louis, Missouri 63102 Appearing on behalf of Defendant.</p> <p style="padding-left: 40px;">Also present: Maryvonne Tompkins, Videographer</p>	<p style="text-align: center;">I N D E X (Continued)</p> <p style="text-align: center;">EXHIBITS INITIAL REFERENCE</p> <p>Exhibit 1 Loveland Core Documents 5</p> <p>Exhibit 2 Gilbert Testimony List 6</p> <p>Exhibit 3 Gilbert Invoice 7</p> <p>Exhibit 4 3-12-19 Gilbert Report 8</p> <p>Exhibit 5 Scene Diagram 8</p> <p>Exhibit 6 Accident Calculations 8</p> <p>Exhibit 7 Case Sheet and Notes from 8 Vehicle Inspection</p> <p>Exhibit 8 Handwritten Notes of Scene 9 Inspection</p>
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<p>Pursuant to Notice and the Federal Rules of Civil Procedure, the video deposition of MICKY GILBERT, P.E., called by Defendant, was taken on Tuesday, April 16, 2019, commencing at 9:02 a.m., at 216-16th Street, Suite 600, Denver, Colorado, before Patricia M. Wrede, Registered Professional Reporter and Notary Public within and for the State of Colorado.</p> <p style="text-align: center;">I N D E X</p> <p>VIDEO DEPOSITION OF MICKY GILBERT, P.E.</p> <p>EXAMINATION BY: PAGE</p> <p>Mr. Farrar --</p> <p>Mr. Bott 5</p>	<p style="text-align: center;">P R O C E E D I N G S</p> <p>(Exhibits 1 through 8 marked.)</p> <p>THE VIDEOGRAPHER: Here begins videotape number 1 in the deposition of Micky Gilbert in the matter of Rysta Leona Susman, et al. versus the Goodyear Tire and Rubber Company in the United States District Court for the District of Nebraska, Case Number 8:18-cv-00127. Today's date is April 16, 2019. The time on the video monitor is 9:02 a.m. The video operator today is Maryvonne Tompkins. This video deposition is being taken at 216-16th Street, Suite 600, in Denver, Colorado.</p> <p>Would the counsel please identify themselves and the party they represent, please.</p> <p>MR. FARRAR: Kyle Farrar for the plaintiffs.</p> <p>MR. BOTT: Ed Bott for Goodyear.</p> <p>THE VIDEOGRAPHER: Our court reporter, Patty Wrede, of Epiq Link will please swear in the witness and we can proceed.</p>

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<p style="text-align: right;">29</p> <p>1 diagram would that throttle application have 2 occurred? 3 A Let's see. If it -- so if it's at the 4 pavement edge, then that would have occurred right 5 about the time it went into that final yaw sequence. 6 If it -- 7 Q Wait, wait. I'm not sure I understand 8 that. So when you -- when you say if it's at the 9 pavement edge, does that mean if the 10 algorithm-enabled event was at the pavement edge? 11 A Correct. 12 Q Then it would have been at the beginning 13 of the final yaw sequence, which, if I remember 14 correctly, would have been at about the 300 mark? 15 A It's 300 or slightly before, right. 16 Q Okay. All right. So I got that part. 17 And then what's the other part of the 18 reference range? 19 A If the nondeployment event is at rollover, 20 then it just -- it just brings everything up with it 21 2 seconds before rollover. So somewhere in the 22 middle of the final yaw sequence. 23 Q And again looking at your diagram, can you 24 give me a reference point? 25 A Not better than that. I mean, somewhere</p>	<p style="text-align: right;">31</p> <p>1 horsepower it can affect the yaw. With something 2 like this it's not going to have much of an effect at 3 all. In fact, if you look at the yaw sequence, it's 4 already in that arc, and it's not going to look much 5 different if he's on the throttle or not on the 6 throttle. 7 Q Will throttle in a yaw cause the vehicle 8 to spin out? 9 A With high horsepower. Not with this. 10 Q All right. 11 A I mean, he's already going -- I mean, he's 12 already pretty much committed to that arc, is my 13 opinion, before he's on the throttle. 14 Q Okay. Have you reached any conclusion as 15 to why the throttle was applied? 16 A I don't. I didn't see it in his depo 17 either. 18 Q When was -- 19 A I do -- I do remember him saying no 20 braking, but I don't know why he -- why he went to 21 the gas pedal. Or if he did. I mean, it's -- the 22 CDR, it's sort of in line with what is happening but 23 it's not -- it doesn't look perfect, so I don't -- I 24 don't know if it's a faulty sensor when it gets 25 sideways or what, but it seems weird that he'd go to</p>
<p style="text-align: right;">30</p> <p>1 in there. It's not going to be a big factor in the 2 dynamics of what's happening. The engine's not going 3 to overcome anything that's already happening. It's 4 not like this thing has, you know, 700 horsepower and 5 is doing a doughnut or anything. 6 So in my opinion it's going to have no 7 effect on the dynamics. So I -- but I don't know, to 8 be fair, I don't know exactly when it was. 9 Q Okay. But based on the CDR data, the most 10 likely scenario is that throttle was applied by 11 Mr. Blair sometime between roughly the 300-foot mark 12 on your diagram and when? 200 feet? 13 A Something like that. That's about right. 14 300 to 150 feet -- 15 Q Okay. 16 A -- maybe. 17 Q And if throttle is applied in a yaw 18 sequence, what will happen to the vehicle? 19 A Well, like I was saying, like in a race 20 car example, it -- the drivers sometimes use the 21 throttle to control the trajectory of the vehicle by 22 spinning it. To avoid hitting the wall, you can -- 23 you can hit throttle, and it just causes the car to 24 go around and it follows the arc of the corner. 25 So it can -- it can -- with high</p>	<p style="text-align: right;">32</p> <p>1 throttle instead of brake is all I'm saying. 2 Q So the options would be that either he did 3 it intentionally or there'd be maybe pedal 4 misapplication? 5 A Maybe a pedal misapplication, maybe a 6 sensor problem. I don't know. 7 Q In the tire that had the partial 8 detachment, when was the inflation pressure lost in 9 that tire? 10 A Not till rollover. There's -- probably 11 during the roll sequence it took a pretty good hit on 12 the asphalt, but there's no debad during the 13 sequence and the thing was -- the axle was hopping a 14 pretty decent amount on the pavement, which would 15 accentuate the chances for debad, and it did not 16 debad. 17 Q Okay. If we could go to -- one second, 18 please. 19 If you could turn then to your vehicle 20 inspection notes. I don't know what number that is. 21 A This is 7. 22 Q Okay. I just want to go through this a 23 little bit with you. 24 A Sure. 25 Q I see you've noted the tread depth on all</p>

1 STATE OF COLORADO)
2) ss. REPORTER'S CERTIFICATE
COUNTY OF DENVER)

3 I, Patricia M. Wrede, do hereby certify
4 that I am a Registered Professional Reporter and
5 Notary Public within the State of Colorado; that
6 previous to the commencement of the examination, the
7 deponent was duly sworn to testify to the truth.

8 I further certify that this deposition was
9 taken in shorthand by me at the time and place herein
10 set forth, that it was thereafter reduced to
11 typewritten form, and that the foregoing constitutes
12 a true and correct transcript.

13 I further certify that I am not related
14 to, employed by, nor counsel for any of the parties
15 or attorneys herein, nor otherwise interested in the
16 result of the within action.

17 In witness whereof, I have affixed my
18 signature this 24th day of April, 2019.

19 My commission expires March 21, 2021.

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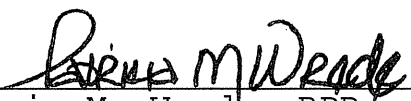
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Patricia M. Wrede, RPR
216 - 16th Street, Suite 600
Denver, Colorado 80202